

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA

)

)

v.

)

Case Number: 1:12mj610

)

ARTAVIA PALMER

)

)

MOTION FOR RECONSIDERATION OF REQUEST FOR REASONABLE BOND

ARTAVIA PALMER, by and through counsel, hereby moves this Court to reconsider its previous ruling on bond. Please consider the argument and authority provided below.

In her previous Motion for Bond, Ms. Palmer set forth her argument and authorities in support of her request. Since argument on that motion, Ms. Palmer's close friend, Jessica Willis, has requested to serve as a third party custodian for Ms. Palmer.

Ms. Willis has spoken with Pre-trial Services, and is eligible to serve as a third party custodian for the Defendant.

It is respectfully submitted that with the addition of a suitable third party custodian, this Court may fashion reasonable terms of release for the Defendant that ensure the Defendant's future appearance in Court and the safety of the community.

Under the provisions of the Bail Reform Act, as applied to this case, there are conditions of release which this Court, in its wisdom, broad discretion and authority, can set to allow Ms. Palmer's release on compliance with the Act.

We suggest the following: 1.) pre-trial services supervision, 2.) substance abuse testing and treatment, 3.) a third party custodian, and 4.) regular reporting to pre-trial services.

This case does not warrant detention.

Respectfully submitted

Artavia Palmer

By Counsel

/s/

Alfred L. Robertson, Jr.

VSF # 45000

Robertson Law Office, PLLC

11350 Random Hills Rd., #800

Fairfax, VA 22030

(703) 934-6148

(703) 352-7014 (facsimile)

rob@robertsonlawoffice.com

Counsel for Artavia Palmer

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on the 18th day of October, 2012, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system, which will send notification of such filing (NEF) to the following:

Jessica Hurtz, Esquire
Special Assistant United States Attorney
Office of the United States Attorney
2100 Jamieson Avenue
Alexandria, Virginia 22314
Tel: (703) 299-3700
Fax: (703) 299-3982
Jessica.Hurtz@usdoj.gov

/s/

Alfred L. Robertson, Jr.

VSF # 45000

Robertson Law Office, PLLC

11350 Random Hills Rd., #800

Fairfax, VA 22030

(703) 934-6148

(703) 352-7014 (facsimile)

rob@robertsonlawoffice.com

Counsel for Artavia Palmer